



State of Utah

GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF ENVIRONMENTAL
RESPONSE AND REMEDIATION

Brent H. Everett
Director

1266098 - R8 SDMS

ERRC-188-10

September 2, 2010

Jeff Schoenbacher
Environmental Coordinator
Building Department
Park City Municipal Corporation
1255 Iron Horse Drive
P.O. Box 1480
Park City, Utah 84060

Robert Jasper
Summit County Manager
60 North Main
Coalville, Utah 84017

RE: Triangle Parcel, Lower Silver Creek, Voluntary Cleanup Site VCP #070, Park City, Utah

Dear Mr. Schoenbacher and Mr. Jasper:

The Division of Environmental Response and Remediation (DERR) has completed review of the *Environmental Assessment Voluntary Cleanup Program Triangle Parcel Lower Silver Creek (EA)* dated April 21, 2010, for the referenced site. The document is considered the Environmental Assessment under the Voluntary Cleanup Program.

The DERR's review comments are enclosed with this letter. It is requested that Park City Municipal Corporation and Summit County address the comments in conjunction with the development of a *Site Characterization Work Plan* for the site. As noted during our site visit on July 19, 2010, the DERR will request the U.S. Environmental Protection Agency (EPA) review and accept the characterization strategy, and remedial strategy if necessary, as well.

If you have any questions, please contact the undersigned at (801) 536-4104. Thank you for your assistance in this matter.

Sincerely,

Joseph Katz, Project Manager
Division of Environmental Response and Remediation

JHK/eds

cc: Kathryn Hernandez, U.S. EPA Region VIII
Sam Wilkes, Tetra Tech, Inc.
Mo Slam, Division of Environmental Response and Remediation
Steve Jenkins, Director, Summit County Public Health Department
Kathy Harris, AMEC Environmental

DERR Review Comments
Environmental Assessment – Triangle Parcel, Lower Silver Creek

General Comments

1. Based on the information collected to date, it is necessary to characterize the Site, per the requirements of the VCP Agreement, to determine if the Site is potentially impacted. Please propose a sampling strategy to characterize the Site. To help facilitate acceptance of the Site Characterization Workplan, DERR previously provided you with two examples of Sampling Analysis Plans that had previously been accepted for the Lower Silver Creek area. More recently, the DERR provided a third example which was the sampling plan for the Parcel 2A property. It is acceptable to use these plans to help draft a document for review.
2. The sampling strategy should include samples collected from both the floodplain and the uplands. Please address this comment in the Site Characterization Workplan.
3. The proposed sample scheme should evaluate surface and subsurface soil conditions. For this sampling event, please include surface samples over the 0-2 inch horizon and subsurface samples to define the nature and extent of contamination. If there are wetlands on the property, surface water and sediment samples should also be collected. This comment is applicable to specific comment # 2.
4. Future sampling should also evaluate potential transport mechanisms such as drainages. Based on the site visit, please collect samples from any drainages that intersect or cross the site to assess potential impact. In the Site Characterization Workplan, please include a map detailing the location of all drainages that traverse the Site.
5. Please propose a strategy to evaluate the groundwater pathway.
6. Please ensure that future sampling and laboratory analysis is performed under a Quality Assurance Project Plan (QAPP) that includes a level III reporting package. Please provide the QAPP to DERR for review prior to sampling.
7. Please ensure that the analytical laboratory provides laboratory analysis results for the project in an Excel format similar to the format that has been provided to your consultant. Also, please include latitude and longitude coordinates for each sample collected as an Appendix to the sampling report.
8. Please describe the installation history of the sewer line that runs along the eastern portion of the site. Please indicate the depth of the line and whether there was any note of possible tailings that may have been encountered during the installation. Please indicate how soil that was dug up during the installation was managed. Due to the location of this line along the eastern portion of the site, it is prudent to collect a few

samples to verify there is no potential impact. Please propose sampling to address this comment.

9. DERR will accept the screening levels established for Lower Silver Creek. Please include the levels in the Site Characterization Workplan.

Specific Comments:

1. Section 2.2 Lower Silver Creek Data Summary Report – March 24, 2008, fourth paragraph: This paragraph describes various areas within the Lower Silver Creek basin and the general distribution and depth of tailings within these areas. Please indicate which area the Triangle Parcel lies within.

2. Section 2.5: Based on data provided in the EA, elevated levels of lead and arsenic were detected in the floodplain and in the irrigation ditch that crosses this area. Please propose additional sampling to define the nature and extent of impact. This comment is also applicable to General Comment #3.

3. Section 3.2 Meteorology, Hydrogeology, and Hydrology, last paragraph: This paragraph describes groundwater characteristics for the Park City area as a whole. Please provide any available information about the groundwater flow direction and depth to groundwater in the vicinity of the site.

End of Review Comments.



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RESPONSE AND REMEDIATION

Brent H. Everett
Director

ERRC-148-10

July 27, 2010

Vaughn Burbidge, Agent
Forestdale Investments, LLC
911 South Rio Grande
Salt Lake City, Utah 84111

Jim Seaberg
Sundborn, LLC
978 Woodoak Lane
Salt Lake City, Utah 84117

RE: Park City Business Center Subdivision, Voluntary Cleanup Site (VCP) #071, Park City, Utah

Dear Mr. Burbidge and Mr. Seaberg:

The Division of Environmental Response and Remediation (DERR) has completed review of the three reports submitted for the Environmental Assessment for the referenced site. The following documents are considered the Environmental Assessment under the Voluntary Cleanup Program:

- *Phase I Environmental Site Assessment*, by AGECE dated June 30, 2005
- *Environmental Sampling Report, Lots 27 & 28*, by AGECE dated September 15, 2009
- *Environmental Sampling Report, Lot 5*, by AGECE dated April 29, 2010

The DERR's review comments are enclosed with this letter. It is requested that Forestdale Investments, LLC, and Sundborn, LLC, address the comments in conjunction with the development of a *Site Characterization Work Plan(s)* for the site. As noted during our site visit on June 30, 2010, the DERR will request the U.S. Environmental Protection Agency (EPA) review and accept the characterization strategy, and remedial strategy if necessary, as well.

If you have any questions, please contact the undersigned at (801) 536-4092. Thank you for your assistance in this matter.

Sincerely, 67

Elizabeth Palmer

Elizabeth Palmer, P.G.
Project Manager
Division of Environmental Response and Remediation

EAP/eds

Enclosure(s)

cc: Kathryn Hernandez, U.S. EPA, Region VIII
Sam Wilkes, Tetra Tech, Inc.
Mo Slam, Division of Environmental Response and Remediation
Steve Jenkins, Director, Summit County Public Health Department
Tom Atkinson, Applied Geotechnical Engineering Consultants, Inc. (AGEC)
Dick Burbidge, Attorney for Applicants

DERR REVIEW COMMENTS
PARK CITY BUSINESS CENTER SUBDIVISION VCP SITE
ENVIRONMENTAL ASSESSMENT
July 15, 2010

General Comments

1. Based on the information collected to date, it is necessary to characterize the Site, per the requirements of the VCP Agreement, to determine if the Site is potentially impacted. As previously discussed during the site visit on June 30, 2010, it is acceptable to submit a sampling strategy to evaluate only Lot 27/28 (PCBC-B-1, 2.99 acres), Lot 5 (PCBC-5, 0.93 acres), Lot 20 (PCBC-20, 2.00 acres), Lot 26 (PCBC-26, 1.70 acres), Lot 9 (PCBC-9, 1.15 acres), and Lot 10 (PCBC-10, 2.10 acres) as part of the first phase of sampling. As part of the second phase of sampling it is expected that the applicant will submit a sampling strategy for the remainder of the Site, including the floodplain. Samples should be collected to define possible contamination and to demonstrate the remaining portion of the uplands, not represented by the previously mentioned lots, are unimpacted. To help facilitate acceptance of the Site Characterization Workplans, DERR provided you with two examples of Sampling Analysis Plans that had previously been accepted for the Lower Silver Creek area. It is acceptable to use these plans to help draft documents for review.
2. As a follow-up to comment No. 1, the UDEQ will issue a letter to acknowledge completion of the characterization and cleanup, if necessary, of Lot 27/28 (PCBC-B-1, 2.99 acres), Lot 5 (PCBC-5, 0.93 acres), Lot 20 (PCBC-20, 2.00 acres), Lot 26 (PCBC-26, 1.70 acres), Lot 9 (PCBC-9, 1.15 acres), and Lot 10 (PCBC-10, 2.10 acres), in accordance with the Voluntary Cleanup Program prior to issuing a Certificate of Completion. The UDEQ will not issue any additional letters providing this type of acknowledgment for other phases but will instead issue a single Certificate of Completion once the entire Site has been characterized and cleaned up.
3. The proposed sample scheme should evaluate surface and subsurface soil conditions. Please include surface samples over the 0-2 inch horizon and subsurface samples from two inches to one foot below ground surface. It may be convenient to include as subsurface samples all evenly numbered locations. If there are wetlands on the property, surface water and sediment samples should also be collected. Please note that additional sampling to define the nature and extent of impact may be necessary in the future if contaminants are reported.
4. Future sampling should also evaluate potential transport mechanisms such as irrigation ditches and natural topographic drainages. Based on the site visit, please evaluate the site for possible irrigation ditches and drainages. In the Site Characterization Workplan, please include a map detailing the location of all ditches that traverse the Site as well as any intake or outfall locations. Please describe how the irrigation ditches and drainages will be sampled to test whether there are possible contaminants.
5. Future sampling should also evaluate potential mine tailings deposited on site. Based on the site visit, please evaluate the site for tailings and note that samples should also be biased toward the Lower Silver Creek floodplain since this area is known to be the area of suspected tailings deposition. In the Site Characterization Workplan, please include a map detailing the location of all suspected mine tailings. If there are suspected tailings on site, please estimate the

thickness of the tailings pile(s) and propose sampling to define the extent so a potential volume can be calculated.

6. Please propose a strategy to evaluate the groundwater pathway.
7. Please ensure that future sampling and laboratory analysis is performed under a Quality Assurance Project Plan that includes a level III reporting package.
8. Please describe the installation history of the sewer line that runs along the eastern portion of the Site. Please indicate the depth of the line and whether there was any note of possible tailings that may have been encountered during the installation. Please indicate how soil that was dug up during the installation was managed. Due to the location of this line along the eastern portion of the site, it is prudent to collect a few samples to verify there is no potential impact. Please propose sampling to address this comment.
9. DERR will accept the screening levels established for Lower Silver Creek. Please include the levels in the Site Characterization Workplan.
10. The previous fuel spill, which was addressed under the oversight of the County, will not be included in the Site Characterization Work Plan, nor in the Certificate of Completion.

No Specific Comments were noted.

End of Review Comments.